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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

STATE OF TEXAS, )  
Plaintiff, )  
VS. )  
ERIC H. HOLDER, JR., IN )  
HIS OFFICIAL CAPACITY AS )  
ATTORNEY GENERAL OF THE )  
UNITED STATES, )  
Defendant, )  
ERIC KENNIE, ET AL., )  
Defendant-Intervenors, )  
THE TEXAS STATE CONFERENCE )  
OF NAACP BRANCHES, ET )  
AL., )  
Defendant-Intervenors, )  
TEXAS LEAGUE OF YOUNG )  
VOTERS EDUCATION FUND, ET )  
AL., )  
Defendant-Intervenors, )  
TEXAS LEGISLATIVE BLACK )  
CAUCUS, ET AL., )  
Defendant-Intervenors, )  
VICTORIA RODRIGUEZ, ET )  
AL., )  
Defendant-Intervenors. )

CASE NO. 1:12-CV-00128  
(RMC-DST-RLW)  
Three-Judge Court

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APPEARANCES

FOR THE PLAINTIFF STATE OF TEXAS:  
Mr. Adam Aston  
ATTORNEY GENERAL OF TEXAS  
Civil Medicaid Fraud Division  
209 W. 15th Street  
Austin, Texas 78701  
adam.aston@oag.state.tx.us  
FOR THE DEFENDANTS ERIC H. HOLDER, ET AL.:  
Ms. Michelle McLeod  
U.S. DEPARTMENT OF JUSTICE  
1800 G Street, 7254  
NWB - Room 7202  
Washington, DC 20006  
michelle.mcleod@usdoj.gov  
RODRIGUEZ DEFENDANT-INTERVENORS:  
Ms. Nina Perales  
110 Broadway, Suite 300  
San Antonio, Texas 78205  
nperales@maldef.org  
ALSO PRESENT:  
MR. Luis Figueroa - Legislative Staff Attorney  
MALDEF  
110 Broadway, Suite 300  
San Antonio, Texas 78205  
lfigueroa@maldef.org  
Mr. Glenn Bayron - Mi Familia Vota

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\*\*\*\*\*  
ORAL DEPOSITION OF  
LYDIA CAMARILLO  
JUNE 12, 2012  
\*\*\*\*\*  
ORAL DEPOSITION OF LYDIA CAMARILLO, produced as a  
witness at the instance of the Defendants Eric H. Holder,  
et al., and duly sworn, was taken in the above-styled and  
numbered cause on Wednesday, June 12, 2012, from 9:00 a.m.  
to 10:41 a.m., before Tamara K. Chapman, CSR in and for  
the State of Texas, reported by machine shorthand, at the  
Omni, 9821 Colonnade Boulevard, San Antonio, Texas,  
pursuant to the Federal Rules of Civil Procedure and the  
provisions stated on the record or attached hereto.

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NO. DESCRIPTION PAGE

1 Notice  
(No Bates - 2 pages) 9  
2 SB 14  
(No Bates - 17 pages) 20  
3 5/1/12 e-mail from Carlos Duarte,  
Subject: Fwd: Take Action against  
"True the Vote"  
(Bates RODR-138) 32

<p style="text-align: center;">5</p> <p>1 LYDIA CAMARILLO, 2 having been first duly sworn, testified as follows: 3 EXAMINATION 4 BY MR. ASTON: 5 Q. Good morning. 6 A. Good morning. 7 Q. My name is Adam Aston. I represent the State of 8 Texas. Could you please state and then spell your full 9 name for the record? 10 A. Lydia Camarillo, L-Y-D-I-A C-A-M-A-R-I-L-L-O. 11 Q. Have you ever been deposed before? 12 A. Yes, I have. 13 Q. How many times? 14 A. I believe once. 15 Q. Can you explain the case or was it for 16 litigation? 17 A. It was the -- it was the redistricting case. 18 Q. And when was that deposition taken? 19 A. I do not remember. I believe it was January, but 20 I'm not absolutely sure. 21 Q. So four or five months ago? 22 A. Yes. 23 Q. Okay. We're going to go over a few things to 24 hopefully make this run smoothly, and then we'll get 25 started. Okay?</p>	<p style="text-align: center;">7</p> <p>1 A. Oh, my goodness. Nina, N-I-N-A. Perales. I 2 always spell it with -- 3 MS. PERALES: P-E-R-A-L-E-S. 4 MR. FIGUEROA: Luis Figueroa, L-U-I-S 5 F-I-G-U-E-R-O-A. 6 THE WITNESS: Thank you for the help. 7 MS. PERALES: You're very welcome. 8 Q. (BY MR. ASTON) And when did that representation 9 begin? 10 A. I think it began informally when we began the 11 conversations about redistricting. Oh, for this case? 12 Q. Yes, ma'am. 13 A. As soon as we decided to move forward with this 14 case. 15 Q. Do you know about when that was? 16 A. I do not remember, but we felt that as soon as we 17 knew that the legislation was going to move forward and it 18 was going to be signed by the governor, we were going to 19 prepare ourselves to move forward with the lawsuit if 20 necessary. 21 Q. So this would have been before the lawsuit was 22 filed sometime last fall? 23 A. Well, you asked formally. So it wasn't until we 24 signed the form. 25 Q. Do you understand that you've been designated to</p>
<p style="text-align: center;">6</p> <p>1 A. Okay. 2 Q. Please answer audibly so the court reporter can 3 hear you. No shaking or nodding of the head because those 4 answers cannot be recorded. Okay? 5 A. I understand. 6 Q. If you don't understand my question or if you'd 7 like for me to slow down at any point, please let me know. 8 A. I will. 9 Q. Please wait until I finish my question to answer, 10 and I will try to wait until you finish an answer before I 11 ask another question. Okay? 12 A. All right. Thank you. 13 Q. Your lawyer may object to a question, but even if 14 she objects, unless she instructs you not to answer, 15 you'll still be answering the question. Do you 16 understand? 17 A. I do. 18 Q. Are you represented by counsel today? 19 A. Yes, I am. 20 Q. Who is your counsel? 21 A. Nina Perales and Luis Figueroa. And MALDEF. 22 Q. And when -- with MALDEF? 23 A. Yes. 24 Q. And could you please spell their names for the 25 record?</p>	<p style="text-align: center;">8</p> <p>1 provide testimony today on behalf of the Southwest Voter 2 Registration Education Project? 3 A. Yes. 4 Q. Unless I indicate otherwise, when I use the term 5 "you" or "Southwest Voter" or "your organization" during 6 this deposition, that term includes the Southwest Voter 7 Registration Education Project and anyone acting on its 8 behalf. Do you understand? 9 A. I do believe that I'm speaking for Southwest 10 Voter Registration Education Project, and I have the 11 authority to do so. 12 Q. But what I'm saying is if at any point in this 13 deposition I say "you" or "your organization," what I'm 14 referring to you is not you individually unless I make 15 that explicitly clear -- 16 A. I understand. 17 Q. -- I'm referring to your organization. Thank 18 you. 19 Did you prepare for your deposition today? 20 A. I did. 21 Q. What did you do to prepare? 22 A. I read my former testimony. I reviewed SB 14. I 23 looked at the notice, and I looked at other materials 24 provided by my attorney. 25 Q. When you're referring to your former testimony,</p>



<p style="text-align: center;">9</p> <p>1 do you mean your -- the testimony from redistricting?</p> <p>2 A. No, the testimony that I gave before the</p> <p>3 legislature on voter ID. Opposing it.</p> <p>4 Q. About how long would you say that you spent</p> <p>5 preparing for this deposition, reviewing those materials</p> <p>6 and --</p> <p>7 A. Half an hour.</p> <p>8 Q. A total of about a half hour to prepare?</p> <p>9 A. Yes.</p> <p>10 Q. In addition to your prior testimony and Senate</p> <p>11 Bill 14, did you review any other documents to prepare?</p> <p>12 A. I did. And I met with my attorneys.</p> <p>13 Q. And you said the notice.</p> <p>14 A. Yes.</p> <p>15 Q. You reviewed the notice.</p> <p>16 Anything else?</p> <p>17 A. I looked at the other stuff that I was working</p> <p>18 with my attorneys.</p> <p>19 (Exhibit 1 was marked.)</p> <p>20 A. This is mine?</p> <p>21 Q. (BY MR. ASTON) Yes, ma'am. That has been marked</p> <p>22 Exhibit 1. Would you please review it for a moment and</p> <p>23 then we'll discuss it for a few minutes.</p> <p>24 A. Okay.</p> <p>25 Q. Do you recognize this document?</p>	<p style="text-align: center;">11</p> <p>1 Project's membership, including all individuals Southwest</p> <p>2 Voter Registration Education Project purports to represent</p> <p>3 in this lawsuit.</p> <p>4 You've been designated to testify on Topic 3?</p> <p>5 A. Correct, yes.</p> <p>6 Q. And you're prepared to testify on Topic 3?</p> <p>7 A. Yes.</p> <p>8 Q. Topic 4: Southwest Voter Registration Education</p> <p>9 Project's activities related to voter identification</p> <p>10 legislation proposed or enacted in Texas.</p> <p>11 You've been designated on Topic 4?</p> <p>12 A. Yes.</p> <p>13 Q. And --</p> <p>14 A. I guess.</p> <p>15 Q. And you're prepared --</p> <p>16 A. I'm sorry.</p> <p>17 Q. -- to testify on Topic 4?</p> <p>18 A. The first rule you told me. I apologize.</p> <p>19 Q. That's quite all right.</p> <p>20 And you are prepared to testify on Topic 4?</p> <p>21 A. Yes, I am.</p> <p>22 Q. Topic 5: Southwest Voter Registration Education</p> <p>23 Project's activities related to voter identification</p> <p>24 legislation proposed or enacted by states other than</p> <p>25 Texas.</p>
<p style="text-align: center;">10</p> <p>1 A. I sure do. It's the one I was referring to.</p> <p>2 Q. If you could turn to Page 2. This is the list of</p> <p>3 topics that Southwest Voter has been requested to provide</p> <p>4 a person to testify as to. Topic No. 1: The factual</p> <p>5 basis of Southwest Voter Registration Education Project's</p> <p>6 claims or defenses in this lawsuit, including any</p> <p>7 contingent in Senate Bill 14, was enacted for the purpose</p> <p>8 or have the effect of denying or abridging the right to</p> <p>9 vote on account of race, color, or membership in a</p> <p>10 language minority group.</p> <p>11 Have you been designated to testify on Topic 1?</p> <p>12 A. Yes.</p> <p>13 Q. And are you prepared to testify about Topic 1?</p> <p>14 A. Yes.</p> <p>15 Q. And your preparations to testify included the</p> <p>16 things you mentioned before?</p> <p>17 A. Correct.</p> <p>18 Q. Topic 2: Any interest of Southwest Voter</p> <p>19 Registration Education Project in this litigation that is</p> <p>20 not adequately represented by the United States.</p> <p>21 Have you been designated to testify on Topic 2?</p> <p>22 A. Yes.</p> <p>23 Q. Are you prepared to testify about Topic 2?</p> <p>24 A. Yes.</p> <p>25 Q. Topic 3: Southwest Voter Registration Education</p>	<p style="text-align: center;">12</p> <p>1 You've been designated on the topic?</p> <p>2 A. Yes.</p> <p>3 Q. And you're prepared?</p> <p>4 A. Yes.</p> <p>5 Q. Topic 6: Any policy making or advocacy-related</p> <p>6 work performed by or on behalf of Southwest Voter</p> <p>7 Registration Education Project regarding voter</p> <p>8 identification.</p> <p>9 You've been designated on Topic 6?</p> <p>10 A. Yes.</p> <p>11 Q. And you're prepared on Topic 6?</p> <p>12 A. Yes.</p> <p>13 Q. No. 7: Southwest Voter Registration Education</p> <p>14 Project's activities related to voter registration or</p> <p>15 education.</p> <p>16 Have you been designated on Topic 7 - --</p> <p>17 A. Yes.</p> <p>18 Q. -- and are you prepared on Topic 7?</p> <p>19 A. Yes.</p> <p>20 Q. Topic No. 8: Southwest Voter Registration</p> <p>21 Education Project's election-related activities, including</p> <p>22 but not limited to, driving voters to the polls,</p> <p>23 assistance with mail-in ballots and poll watching. Have</p> <p>24 you been designated on Topic 8?</p> <p>25 A. Yes.</p>



<p style="text-align: center;">13</p> <p>1 Q. And you're prepared on Topic 8?</p> <p>2 A. Yes.</p> <p>3 Q. No. 9: Southwest Voter Registration Education</p> <p>4 Project's plans to assist registered voters to obtain</p> <p>5 identification required by Senate Bill 14.</p> <p>6 You've been designated on this topic?</p> <p>7 A. Yes.</p> <p>8 Q. And you're prepared on this topic?</p> <p>9 A. Yes.</p> <p>10 Q. No. 10: Any activities by or on behalf of</p> <p>11 Southwest Voter Registration Education Project regarding</p> <p>12 Senate Bill 14.</p> <p>13 Have you been designated on this topic?</p> <p>14 A. Yes.</p> <p>15 Q. And you are prepared?</p> <p>16 A. Yes.</p> <p>17 Q. And finally No. 11. Any activities by or on</p> <p>18 behalf of Southwest Voter Registration Education Project</p> <p>19 regarding Senate Bill 362 in 2009?</p> <p>20 A. Yes.</p> <p>21 Q. You've been designated?</p> <p>22 A. Yes.</p> <p>23 Q. And you're prepared?</p> <p>24 A. Yes.</p> <p>25 Q. I'd like to look at Topic 6 before we get any</p>	<p style="text-align: center;">15</p> <p>1 would be publically available, correct?</p> <p>2 A. That is correct.</p> <p>3 Q. And as far as you know, you have -- or you</p> <p>4 believe you've testified not only in 2011 but in 2009 and</p> <p>5 perhaps in '7 and '05 as well?</p> <p>6 A. I'm absolutely sure that I have.</p> <p>7 Q. Let's talk a little bit about the background of</p> <p>8 Southwest Voter. When was the organization founded?</p> <p>9 A. 1974.</p> <p>10 Q. And do you know the corporate structure of the</p> <p>11 organization as a partnership or a 501(c)(3)?</p> <p>12 A. It's a 501(c)(3).</p> <p>13 Q. Do you know how many employees Southwest Voter</p> <p>14 has?</p> <p>15 A. It has ten.</p> <p>16 Q. And what is your role?</p> <p>17 A. I'm the vice president.</p> <p>18 Q. And what do you do as vice president?</p> <p>19 A. Everything, including faxing.</p> <p>20 Q. What else do you do in addition to the faxing?</p> <p>21 A. One of my major roles is figuring out the ground</p> <p>22 operation, fundraising, media and being the spokesperson</p> <p>23 on these issues.</p> <p>24 Q. Does your organization rely on volunteers?</p> <p>25 A. Absolutely.</p>
<p style="text-align: center;">14</p> <p>1 further on: Any policy making or advocacy-related work</p> <p>2 performed by or on behalf of Southwest Voter Registration</p> <p>3 Education Project regarding voter identification.</p> <p>4 Does Southwest Voter engage in policy-related</p> <p>5 activity regarding voter ID legislation?</p> <p>6 A. We have.</p> <p>7 Q. And can you describe that advocacy activity?</p> <p>8 A. We met with several members of the legislature to</p> <p>9 discuss this bill and other bills in the past, and we also</p> <p>10 provided testimony and I not only wrote but actually gave</p> <p>11 the testimony on SB 14. We also spoke to community</p> <p>12 leaders about this issue.</p> <p>13 Q. You gave testimony in 2011 on this bill. Have</p> <p>14 you testified in the past on previous bills?</p> <p>15 A. I believe I've testified every year that this</p> <p>16 issue was brought forth since '05.</p> <p>17 Q. Does Southwest Voter write articles or conduct</p> <p>18 seminars?</p> <p>19 A. We do, but we haven't done this issue.</p> <p>20 Q. Present speakers?</p> <p>21 A. We do, but we haven't done this issue.</p> <p>22 Q. What about conduct studies or surveys?</p> <p>23 A. No, that's another organization. No, we do not.</p> <p>24 Q. And if it was testimony before the legislature in</p> <p>25 either a committee hearing or something like that, that</p>	<p style="text-align: center;">16</p> <p>1 Q. Do you know about how many volunteers you have in</p> <p>2 a given year?</p> <p>3 A. We could have as many as 10,000 or more depending</p> <p>4 on the election cycle.</p> <p>5 Q. So it fluctuates with whether it's an election</p> <p>6 year, but it can be up to 10,000?</p> <p>7 A. Yes.</p> <p>8 Q. And very possibly this year, it being not only an</p> <p>9 election year but a presidential election year, will this</p> <p>10 year be on the higher end?</p> <p>11 A. This year would be on a higher end. That is</p> <p>12 correct. Unlike last year.</p> <p>13 Q. You said "Unlike last year"?</p> <p>14 A. Last year was not a presidential year.</p> <p>15 Q. What are the organization's primary activities?</p> <p>16 A. Voter registration, voter education and</p> <p>17 mobilization of the Latino voters.</p> <p>18 Q. Does your organization drive voters to the polls?</p> <p>19 A. We have. And we do.</p> <p>20 Q. Anything else in addition to the registration and</p> <p>21 the education?</p> <p>22 A. I'm not sure I understand what you're asking me.</p> <p>23 Q. Any other sort of primary activities?</p> <p>24 A. Well, if you're asking me what do I do in voter</p> <p>25 registration, that's a certain activity.</p>



17

1 Q. No, no. The organization itself, what are the  
2 primary activities in addition to --

3 A. Our primary activities are voter registration,  
4 voter education and mobilization of the voters and, when  
5 necessary, have conversations about making sure the voters  
6 have a the right to vote. In this case, stopping a voter  
7 ID because we believe it's unconstitutional and it's  
8 intentional against the right of voters to vote and to  
9 cast a vote.

10 Q. How many offices do you have in the State of  
11 Texas?

12 A. One.

13 Q. And where is that office located?

14 A. San Antonio.

15 Q. Do you have offices in any other states?

16 A. Los Angeles.

17 Q. And do you have operations outside of Texas or  
18 California?

19 A. We have operations in other states depending on  
20 the year. In a presidential cycle it will likely be in  
21 five to ten states depending on how much money we raise.  
22 We are currently working in Los Angeles and we have just  
23 completed voter registration projects in Las Cruces and of  
24 course in Texas. We expect to do other states this year.

25 Q. Do you know what other states you might?

18

1 A. Arizona, New Mexico, Colorado, Florida and of  
2 course California and Texas for now.

3 Q. Is Southwest Voter a membership organization?

4 A. It is not. It is a 501(c)(3).

5 Q. So you don't really have members or anyone joins,  
6 they just -- there's the ten employees and then whoever  
7 volunteers to assist, but it's not a collection of  
8 members?

9 A. It is not a collection of members, that is  
10 correct.

11 Q. Do you know what the annual budget is for  
12 Southwest Voter?

13 A. It depends on the election cycle. This year is  
14 probably going to be a little bit over 1.5 million and it  
15 can go as high as 3 million depending on how much money we  
16 raise.

17 Q. And are most of your -- the way you raise money,  
18 is it mostly through donations?

19 A. It's all through donations.

20 Q. Private?

21 A. It's all private. It's either individuals,  
22 corporations, foundations. It's all private. You're  
23 welcome to make a donation as well, and we take them from  
24 Republicans and Democrats, if that's what you want to  
25 know.

19

1 Q. But you don't receive grants from governmental  
2 entities?

3 A. Never. On purpose.

4 Q. The past year do you know about how much you've  
5 taken in in donations?

6 A. I don't remember right now. Last year was a hard  
7 year. So I think it was not a big year. I don't remember  
8 right now. I can get you that later if you want it.

9 Q. Has your organization made plans to assist voters  
10 with compliance with SB 14 if it goes into effect?

11 A. We are hoping that the courts will agree with our  
12 assumption and assertion that this law violates the  
13 voters. So at this point we're not making plans. Should  
14 the courts agree with you and not us, then we have to  
15 refocus and figure out how we use resources that are very  
16 precious and limited to do so. So we're hoping that the  
17 courts agree with us so that we don't have to go there.

18 Q. So if you haven't made plans, is it also fair to  
19 say that you have not implemented any plans to go into  
20 effect should Senate Bill 14 take effect at this time?

21 A. We haven't implemented any plans. We know what  
22 we need to do if it needs to be done, but it hasn't been  
23 implemented.

24 Q. If it's implemented, you said you know what you  
25 need to do. Can you explain what that is?

20

1 A. Part of it will have to be a wide media campaign.  
2 It's very difficult for people to understand what are the  
3 rights and what are the requirements and what documents  
4 they can use or not use in order to be able to vote. As  
5 well as figuring out how we get them to places in order to  
6 get their IDs.

7 Q. And then your organization, would you help them  
8 obtain those IDs if that became a requirement?

9 A. I don't know yet. It depends on how much money  
10 it would take to do that. It depends. We might.

11 Q. But you'll certainly educate the voters about  
12 what is required under the new law?

13 A. That is correct. You know, it's 2.1 million  
14 voters that we're speaking of. In Texas.

15 (Exhibit No. 2 was marked.)

16 Q. (BY MR. ASTON) You've been given what is marked  
17 Exhibit 2. Take a minute to familiarize yourself with  
18 that.

19 A. I remember this document.

20 MR. ASTON: This is the document, or this  
21 version of it is the one that we attached to our complaint  
22 and that is what the Exhibit 1 designation means on the  
23 front cover.

24 MS. PERALES: It's not signed.

25 Q. (BY MR. ASTON) So you are familiar with Senate



<p style="text-align: center;">21</p> <p>1 Bill 14?</p> <p>2 A. I sure am.</p> <p>3 Q. And you've read it?</p> <p>4 A. I have read it.</p> <p>5 Q. When did you first hear about the bill?</p> <p>6 A. Oh, gosh. Probably in '05. It's evolving.</p> <p>7 Q. What about this bill?</p> <p>8 A. It's an evolving document. Probably in the</p> <p>9 middle of 2010. We anticipated that this bill was going</p> <p>10 to be brought forth.</p> <p>11 Q. And when was the first time that you read the</p> <p>12 bill?</p> <p>13 A. When it was in the -- available to the public.</p> <p>14 Q. After bill filing --</p> <p>15 A. Yes.</p> <p>16 Q. -- in the -- --</p> <p>17 A. Well, whenever it's ready.</p> <p>18 Q. Just before 2011.</p> <p>19 Have you read it again since then?</p> <p>20 A. Yes. Last night.</p> <p>21 Q. Have you discussed this bill with other employees</p> <p>22 at Southwest Voter?</p> <p>23 A. With my president.</p> <p>24 Q. And what did you discuss and when?</p> <p>25 A. Simply that we're going to get deposed today.</p>	<p style="text-align: center;">23</p> <p>1 A. I heard you say 14.</p> <p>2 Q. Section 14.</p> <p>3 A. Yes.</p> <p>4 (Witness reviews document.)</p> <p>5 Q. (BY MR. ASTON) Driver's license, personal</p> <p>6 identification card. I think those are probably</p> <p>7 self-explanatory.</p> <p>8 Do you know what an election identification</p> <p>9 certificate is?</p> <p>10 A. I sure do.</p> <p>11 Q. Military identification card?</p> <p>12 MS. PERALES: I'm sorry. What's the</p> <p>13 question?</p> <p>14 MR. ASTON: If she's familiar that these are</p> <p>15 the documents that -- or the photo IDs that would be</p> <p>16 accepted.</p> <p>17 A. Yes, I'm also familiar with the documents not</p> <p>18 accepted.</p> <p>19 Q. (BY MR. ASTON) United States citizenship</p> <p>20 certificate that contains the person's photograph,</p> <p>21 passport and a license to carry a concealed handgun?</p> <p>22 A. You know, most citizenship certificates do not</p> <p>23 have photos. They have your little feet.</p> <p>24 Q. Do you know if any of the Southwest Voter's</p> <p>25 employees lack a photo ID that would be required by Senate</p>
<p style="text-align: center;">22</p> <p>1 Q. But prior to learning of the deposition, did you</p> <p>2 discuss this bill during the legislative --</p> <p>3 A. Yes.</p> <p>4 Q. -- session with --</p> <p>5 A. Yes.</p> <p>6 Q. -- employees at Southwest Voter?</p> <p>7 A. I discussed the idea and the intent of the bill,</p> <p>8 and I discussed what we thought would be the outcome</p> <p>9 should this bill become a law.</p> <p>10 Q. And with whom did you have those discussions?</p> <p>11 A. With my president.</p> <p>12 Q. Anyone else?</p> <p>13 A. No.</p> <p>14 Q. You've read the bill. Are you familiar with what</p> <p>15 the different provisions of the bill do?</p> <p>16 A. Yes.</p> <p>17 Q. And --</p> <p>18 A. Right now if you ask me what Section A, B, C is,</p> <p>19 I will have to review it.</p> <p>20 Q. Do you understand what forms of photo ID will be</p> <p>21 accepted for voting at the polls?</p> <p>22 A. Yes.</p> <p>23 Q. Section 14 on Page 9. Turn there.</p> <p>24 A. I do. What did you say? Page what?</p> <p>25 Q. Page 9.</p>	<p style="text-align: center;">24</p> <p>1 Bill 14?</p> <p>2 A. I don't know that.</p> <p>3 Q. Is Southwest Voter aware of any people who do not</p> <p>4 have the photo IDs required by Senate Bill 14?</p> <p>5 A. I am aware.</p> <p>6 Q. All right. Can you identify them by name and</p> <p>7 address, please?</p> <p>8 A. Name and address?</p> <p>9 Q. Sure.</p> <p>10 A. I cannot identify them by name and address. I</p> <p>11 can identify two individuals that are part of this lawsuit</p> <p>12 with us, the young ladies, the Rodriguez, but I cannot</p> <p>13 tell you their first names and I cannot tell you their</p> <p>14 address.</p> <p>15 Q. I am familiar with those two.</p> <p>16 A. But they exist.</p> <p>17 Q. We're going to talk with them this afternoon. I</p> <p>18 know that.</p> <p>19 Are you aware of any other citizens of Texas who</p> <p>20 have not?</p> <p>21 A. I believe those two women reflect many young</p> <p>22 people like them, and I also believe there's also elderly</p> <p>23 Latinos that will be going through the same thing that</p> <p>24 these young women are.</p> <p>25 Q. But again, Southwest doesn't know of any</p>





<p style="text-align: center;">25</p> <p>1 particular individuals --</p> <p>2 A. At this time --</p> <p>3 Q. But Southwest Voter is not aware of any other</p> <p>4 individuals other than your codefendants?</p> <p>5 A. I don't have any names right now, if that's what</p> <p>6 you're asking. Which is different than your question.</p> <p>7 Q. Does Southwest Voter represent anyone else in</p> <p>8 this litigation besides its organization?</p> <p>9 A. Southwest Voter represents Southwest Voter, and</p> <p>10 we believe that in doing so we're representing the</p> <p>11 2.2 million Latinos that are registered to vote and the</p> <p>12 other 2.5 million that could register to vote in the State</p> <p>13 of Texas.</p> <p>14 Q. About what percentage of the organization's</p> <p>15 budget is designated to voter registration activities?</p> <p>16 A. About 80 percent.</p> <p>17 Q. And about what percent is dedicated to voter</p> <p>18 education?</p> <p>19 A. It's all mixed in there because in order to</p> <p>20 register somebody you ask them what's important about</p> <p>21 voting, and that includes the education. And when you</p> <p>22 turn them out to vote, you're also telling them why it's</p> <p>23 important for them to vote. So it's all configured</p> <p>24 together. I don't have it split up like that.</p> <p>25 Q. So you would say education and registration</p>	<p style="text-align: center;">27</p> <p>1 A. No.</p> <p>2 Q. During the legislative session or before, did</p> <p>3 Southwest Voter meet with any interest groups about Senate</p> <p>4 Bill 14?</p> <p>5 A. You're speaking of the last legislative</p> <p>6 legislation, correct?</p> <p>7 Q. Correct.</p> <p>8 A. Yes.</p> <p>9 Q. With whom did you meet?</p> <p>10 A. I believe we met with some in a general meeting</p> <p>11 with League of Women Voters. I believe the ACLU was there</p> <p>12 as well. Mi Familia Vota was there and other community</p> <p>13 groups.</p> <p>14 Q. Do you know how often you met?</p> <p>15 A. I believe we met four times or so. But I'm not</p> <p>16 absolutely sure.</p> <p>17 Q. And do you know of any other organizations with</p> <p>18 which your organization met?</p> <p>19 A. I don't remember right now.</p> <p>20 Q. Did any of those groups provide Southwest Voter</p> <p>21 with any materials on voter ID legislation?</p> <p>22 A. Well, I believe MALDEF was with us, and MALDEF is</p> <p>23 the one that provided the list that I was referring to.</p> <p>24 Q. The fact sheet?</p> <p>25 A. Yes.</p>
<p style="text-align: center;">26</p> <p>1 combined --</p> <p>2 A. Yes.</p> <p>3 Q. -- make up about 80 percent --</p> <p>4 A. Yes.</p> <p>5 Q. -- of your budget?</p> <p>6 A. Yes, we believe that once they are registered</p> <p>7 they will likely vote even if we are not able to turn them</p> <p>8 out to vote ourselves.</p> <p>9 Q. So has your organization produced any reports on</p> <p>10 the voter ID legislation?</p> <p>11 A. Reports, no.</p> <p>12 Q. Did your organization provide its members or</p> <p>13 staff with any materials on voter ID during the 2011</p> <p>14 legislative session?</p> <p>15 A. Only the MALDEF fact sheet, which I believe is</p> <p>16 part of your exhibit.</p> <p>17 Q. Did your organization provide your members or</p> <p>18 staff with any materials on voter ID during the 2009</p> <p>19 legislative session?</p> <p>20 A. I do not remember.</p> <p>21 Q. Do you recall for 2007 or 2005?</p> <p>22 A. I do not remember.</p> <p>23 Q. Has your organization provided its members or</p> <p>24 staff with any materials on voter ID during any</p> <p>25 legislative interim, the time between the sessions?</p>	<p style="text-align: center;">28</p> <p>1 Q. Are you aware of any other documents?</p> <p>2 A. That were presented, no.</p> <p>3 Q. Did Southwest Voter provide its members or staff</p> <p>4 with talking points about Senate Bill 14?</p> <p>5 MS. PERALES: Objection to the extent that</p> <p>6 it says Southwest Voter provided materials to its members,</p> <p>7 because the testimony is that they don't have members.</p> <p>8 Q. (BY MR. ASTON) Did they provide to the staff --</p> <p>9 did they provide the staff with any talking points?</p> <p>10 A. No, because I'm the one that was doing it. So</p> <p>11 it's me, myself and I.</p> <p>12 Q. And did anyone provide your organization with</p> <p>13 talking points, not counting the MALDEF fact sheet that we</p> <p>14 discussed?</p> <p>15 A. I don't think so, no. No, I'm pretty sure no.</p> <p>16 Q. I hope to go about 45 minutes to an hour before</p> <p>17 we take breaks. So if you need a break at any time, just</p> <p>18 let me know.</p> <p>19 A. Yeah. No, I'll ask you if I need to. I think</p> <p>20 I'm fine because I took some stuff to not cough too much.</p> <p>21 Q. Does Southwest Voter Registration Education</p> <p>22 Project intervene along with other parties, correct?</p> <p>23 A. Correct.</p> <p>24 Q. And those parties include Mi Familia Vota</p> <p>25 Education Fund and two individual intervenors?</p>



<p style="text-align: center;">29</p> <p>1 A. Correct.</p> <p>2 Q. And no others?</p> <p>3 A. That is correct.</p> <p>4 Q. During your meetings during the 2011 legislative</p> <p>5 session, was Mi Familia present?</p> <p>6 A. I don't remember them being present until we met</p> <p>7 at a meeting. I don't remember them being present.</p> <p>8 Q. When was that meeting?</p> <p>9 A. The earlier meeting that I just talked about that</p> <p>10 you asked me previously.</p> <p>11 Q. Which one?</p> <p>12 A. You just asked me a question about when have I</p> <p>13 met with some folks on the voter ID. That's the one.</p> <p>14 Q. When did this occur?</p> <p>15 A. Honestly I don't remember. I want to say</p> <p>16 December, but I don't remember.</p> <p>17 Q. So it was after the legislation passed, it was --</p> <p>18 A. Yes.</p> <p>19 Q. -- at some point during consideration of whether</p> <p>20 or not to get involved with this suit?</p> <p>21 A. Yes. But I deserve the right to be incorrect on</p> <p>22 the date because I don't remember.</p> <p>23 Q. Has your organization and Mi Familia ever met to</p> <p>24 discuss intervening in this lawsuit at that meeting?</p> <p>25 A. No.</p>	<p style="text-align: center;">31</p> <p>1 A. Correct.</p> <p>2 Q. And you have filed a joint answer?</p> <p>3 A. Correct.</p> <p>4 Q. And the claims that you're asserting, the two</p> <p>5 organizations, are they based on the same legal and</p> <p>6 factual contentions?</p> <p>7 A. I would assume so.</p> <p>8 Q. Did you personally speak with anyone at the</p> <p>9 Department of Justice about SB 14?</p> <p>10 A. I can't remember. I've talked to the Department</p> <p>11 of Justice on a number of issues and I cannot remember if</p> <p>12 it was on this subject.</p> <p>13 Q. But possible?</p> <p>14 A. Possible it's not, either. So I don't remember.</p> <p>15 Q. Did anyone else at Southwest Voter speak with the</p> <p>16 Department of Justice about Senate Bill 14?</p> <p>17 A. No. I'm the one that's assigned to this issue.</p> <p>18 Q. Did your organization send any letters or e-mails</p> <p>19 to the Department of Justice regarding Senate Bill 14?</p> <p>20 A. No.</p> <p>21 Q. What about regarding this litigation?</p> <p>22 A. No.</p> <p>23 Q. What about preclearance of Senate Bill 14?</p> <p>24 A. I may have sent something on preclearance, but I</p> <p>25 do not remember.</p>
<p style="text-align: center;">30</p> <p>1 Q. Has Southwest Voter and Mi Familia discussed the</p> <p>2 claims that you've asserted in this lawsuit?</p> <p>3 A. No.</p> <p>4 Q. Have the two organizations discussed Senate</p> <p>5 Bill 14?</p> <p>6 A. No. Other than the meeting that we had, which</p> <p>7 was a general discussion about the implications of the</p> <p>8 voter ID.</p> <p>9 Q. So that meeting was about Senate Bill 14?</p> <p>10 A. It was in -- well, I guess --</p> <p>11 Q. By then it had been passed?</p> <p>12 A. By then it was signed by the governor. So is</p> <p>13 that still called SB 14 or is it a law signed by the</p> <p>14 governor?</p> <p>15 Q. For purposes of this case, we're still calling it</p> <p>16 Senate Bill 14.</p> <p>17 A. Okay. Yes.</p> <p>18 Q. Has Southwest Voter shared any written</p> <p>19 information or materials with Mi Familia?</p> <p>20 A. No.</p> <p>21 Q. Has Mi Familia shared any information or</p> <p>22 materials with Southwest Voter?</p> <p>23 A. No.</p> <p>24 Q. The two organizations assert the same claims in</p> <p>25 this lawsuit, correct?</p>	<p style="text-align: center;">32</p> <p>1 (Exhibit 3 was marked.)</p> <p>2 Q. (BY MR. ASTON) You've given what has been marked</p> <p>3 as Exhibit 3. Please review it for a few moments.</p> <p>4 (Witness reviews document.)</p> <p>5 Q. (BY MR. ASTON) Are you familiar with this</p> <p>6 document?</p> <p>7 A. Yes.</p> <p>8 Q. You've seen it before?</p> <p>9 A. Yes. I think I have. You know, I'm not sure.</p> <p>10 I'm familiar with the questions.</p> <p>11 Q. If you could turn to your request for production</p> <p>12 No. 6. All documents in your possession custody or</p> <p>13 control including e-mails and other communications that</p> <p>14 support your contention that Texas Senate Bill 14 has or</p> <p>15 will have an impermissible effect.</p> <p>16 Answer: Defendant-intervenor has no documents</p> <p>17 responsive to this request for production.</p> <p>18 And that's the answer you gave?</p> <p>19 A. Yes.</p> <p>20 Q. And that remains true?</p> <p>21 A. That remains true. We have an e-mail capacity</p> <p>22 that's limited so I usually get rid of stuff.</p> <p>23 Q. As far as other documents as well, you have</p> <p>24 nothing that would provide evidence that you contend --</p> <p>25 A. I don't have anything other than what I gave you,</p>





<p style="text-align: center;">33</p> <p>1 which was the -- in testimony.</p> <p>2 Q. Request for production No. 7: All documents in</p> <p>3 your possession, custody or control, including e-mails and</p> <p>4 other communications that support your contention that</p> <p>5 Texas Senate Bill 14 was enacted with an impermissible</p> <p>6 purpose.</p> <p>7 Answer: Defendant-intervenor has no documents</p> <p>8 responsive to this request for production.</p> <p>9 And that was the answer you gave?</p> <p>10 A. That's correct.</p> <p>11 Q. And it remains true that you have no documents --</p> <p>12 A. That is correct.</p> <p>13 Q. -- with regard to --</p> <p>14 A. That is correct.</p> <p>15 Q. Let's talk for a few minutes about what you</p> <p>16 believe the effect of Senate Bill 14 will be. Does</p> <p>17 Southwest Voter contend that Senate Bill 14 will have the</p> <p>18 effect of denying or abridging Hispanics' and Latinos'</p> <p>19 right to vote on account of race, color or membership in a</p> <p>20 language minority group?</p> <p>21 A. Southwest Voter believes wholeheartedly that</p> <p>22 SB 14 will have a negative impact on Latino voter turnout.</p> <p>23 We believe it's a bill that ultimately was signed by the</p> <p>24 governor with the intent to discriminate and dilute the</p> <p>25 right of Latino voters. We believe that it is a result of</p>	<p style="text-align: center;">35</p> <p>1 Department of -- a place where you pick up the card.</p> <p>2 There might not be a place for that. We know that 40 of</p> <p>3 them are closed. We know that another 30 were going to be</p> <p>4 closed as a result of the budget shortfall.</p> <p>5 We also know that even if you can drive there,</p> <p>6 you might not have the right documentation to get an ID.</p> <p>7 Therefore, it is not free and it is not easy to obtain,</p> <p>8 and we believe it's another hidden tax poll.</p> <p>9 We believe that the State of Texas created a</p> <p>10 crisis that doesn't exist, attacking Latinos, and it's at</p> <p>11 a moment when they wanted to create an anti-immigrant</p> <p>12 opportunity, because we all know that the people that vote</p> <p>13 are American citizens, not immigrants who are unable to</p> <p>14 vote.</p> <p>15 Q. What is your evidence, in addition to what you</p> <p>16 just said, this will have a discriminatory effect? We can</p> <p>17 talk about purpose later, but discriminatory fact.</p> <p>18 A. We believe that speaking and -- being on the</p> <p>19 ground with voters and speaking to them, that there are</p> <p>20 going to be individuals that are going to be harmed. We</p> <p>21 also believe in reading the Brennan report as a second</p> <p>22 source, we believe that that's our evidence. But our</p> <p>23 number one evidence is 38 years of history working on the</p> <p>24 ground with Latino voters and other voters of color.</p> <p>25 Q. So other than your belief and the Brennan report</p>
<p style="text-align: center;">34</p> <p>1 an emergency that was called by the Governor as a crisis</p> <p>2 on voter fraud that is nonexistent on a couple of</p> <p>3 realities that we have.</p> <p>4 One, the Attorney General conducted a two-year</p> <p>5 study of over \$1.5 million to find a case that he never</p> <p>6 found. Second, the Secretary of State provided over</p> <p>7 600,000 names of individuals that are Latino that would</p> <p>8 not be able to provide the ID. And so we believe that the</p> <p>9 state of Texas in a crisis, financial crisis, was unable</p> <p>10 to provide the evidence of voter fraud.</p> <p>11 We believe that it was around the time that</p> <p>12 redistricting was going to happen, when the state grew by,</p> <p>13 over the last ten years, 2.3 million more people, of which</p> <p>14 65 percent of that was Latino. Ultimately 90 percent was</p> <p>15 minority, and it was an attempt by the Governor and the</p> <p>16 legislators to stop the growth of Latino voters, as well</p> <p>17 other people of color.</p> <p>18 We also believe that since the Attorney General</p> <p>19 was not able to provide any case after spending money that</p> <p>20 we don't have, that the State insists that it's going to</p> <p>21 be free when in fact this is not going to be free, for a</p> <p>22 couple of reasons.</p> <p>23 First, a poor person may not have the resources</p> <p>24 to drive to wherever they have to pick it up. If they're</p> <p>25 lucky, there might be a Department of -- DPS, the</p>	<p style="text-align: center;">36</p> <p>1 which says what? What is the Brennan report?</p> <p>2 A. The Brennan report says that individuals will not</p> <p>3 be able to provide the documents, as many as two million,</p> <p>4 in Texas.</p> <p>5 Q. Do you have any other evidence that you believe</p> <p>6 supports your contention?</p> <p>7 A. My 38 years of experience with the organization</p> <p>8 and speaking to voters.</p> <p>9 Q. And what is that evidence?</p> <p>10 A. Individuals telling us that they won't be able to</p> <p>11 produce the documentation.</p> <p>12 Q. Who are these individuals?</p> <p>13 A. Voters.</p> <p>14 Q. Can you name any of them?</p> <p>15 A. I cannot name any of them right now.</p> <p>16 Q. Is that the entire universe of your</p> <p>17 organization's evidence that Senate Bill 14 will have the</p> <p>18 effect of denying or abridging Hispanics' or Latinos'</p> <p>19 right to vote?</p> <p>20 A. That and the history of Texas having a history of</p> <p>21 discriminating against voters and having an intent against</p> <p>22 Latino voters and other voters of color.</p> <p>23 Q. But that's all?</p> <p>24 A. That's enough, don't you think?</p> <p>25 Q. Does Southwest Voter contend that Senate Bill 14</p>



<p style="text-align: center;">37</p> <p>1 will have the effect of denying or abridging</p> <p>2 African-Americans' right to vote on account of race,</p> <p>3 color, or membership in a language minority group?</p> <p>4 A. I cannot speak for the African-American</p> <p>5 community, but I believe they have similar realities that</p> <p>6 the Latino community has.</p> <p>7 Q. Do you have any evidence as to what effect this</p> <p>8 bill might have on African-Americans?</p> <p>9 A. I do not have any evidence.</p> <p>10 Q. Does Southwest Voter contend that Senate Bill 14</p> <p>11 will have the effect of denying or abridging</p> <p>12 Asian-Americans' right to vote on account of race, color,</p> <p>13 or membership in a language minority group?</p> <p>14 A. I think that any voter that's Latino, Asian,</p> <p>15 black, that is poor, that doesn't have the identification,</p> <p>16 will be prohibited from voting if they're American</p> <p>17 citizens and they have the right to vote. I believe this</p> <p>18 bill, this law, whichever you want to call it, violates</p> <p>19 the constitutional rights and the Voting Rights Act of</p> <p>20 American citizens in Texas.</p> <p>21 Q. Do you have any evidence as to the effect this</p> <p>22 bill will have on Asian-Americans?</p> <p>23 A. I have the same evidence that I have for Latinos,</p> <p>24 which is understanding how voters feel.</p> <p>25 Q. Has Southwest Voter conducted any studies or any</p>	<p style="text-align: center;">39</p> <p>1 A. I haven't seen anything like that.</p> <p>2 Q. Do you believe that elderly voters are more</p> <p>3 likely than the average voter to lack a form of</p> <p>4 identification required by Senate Bill 14?</p> <p>5 A. I believe that young voters and older voters will</p> <p>6 have a problem. For older voters, there was a time, if</p> <p>7 you were poor, that you were delivered by a midwife, and</p> <p>8 they may not have provided the right documentation, and</p> <p>9 therefore they might not have in their possession their</p> <p>10 correct certificate.</p> <p>11 Q. But are you -- so that means --</p> <p>12 So do you or do you not believe --</p> <p>13 A. I've made my statement.</p> <p>14 MS. PERALES: It's okay if he asks the</p> <p>15 question again just to get a little bit of clarity, and</p> <p>16 it's all right for you to answer.</p> <p>17 THE WITNESS: Okay.</p> <p>18 Q. (BY MR. ASTON) So your answer is yes?</p> <p>19 A. I'm sorry. Ask again.</p> <p>20 Q. Do you believe that elderly voters are more</p> <p>21 likely than the average voter to lack a form of</p> <p>22 identification required by Senate Bill 14?</p> <p>23 A. I believe that elder Latino voters and young</p> <p>24 Latino voters are going to have a problem to produce the</p> <p>25 required IDs in order to vote in the state of Texas.</p>
<p style="text-align: center;">38</p> <p>1 surveys on the effect that this bill will have on minority</p> <p>2 voters?</p> <p>3 A. No.</p> <p>4 Q. Has Southwest Voter conducted any surveys or any</p> <p>5 studies on the effect that previous voter ID legislation</p> <p>6 would have on minority voters?</p> <p>7 A. No.</p> <p>8 Q. Are you familiar with the polls regarding public</p> <p>9 support for voter ID legislation?</p> <p>10 A. I am familiar with the polls. I am also familiar</p> <p>11 that there was a time when polls said that it was okay to</p> <p>12 have slavery. That doesn't make -- that didn't make it</p> <p>13 right then, and this doesn't make it right either.</p> <p>14 Q. Are you aware of polls showing that the majority</p> <p>15 of Texans support a photographic ID requirement to vote,</p> <p>16 regardless of political affiliation?</p> <p>17 A. I am familiar but that doesn't make it right, as</p> <p>18 the case in slavery.</p> <p>19 Q. Are you aware of polls showing that the majority</p> <p>20 of Texans support a photographic ID requirement to vote</p> <p>21 regardless of their race?</p> <p>22 A. No.</p> <p>23 Q. Are you aware of polls showing that the majority</p> <p>24 of Texans support a photographic ID requirement to vote</p> <p>25 regardless of membership in a language minority?</p>	<p style="text-align: center;">40</p> <p>1 Q. Are you aware of Senate Bill 14's exception to</p> <p>2 the photo ID requirement for voters over the age of 65?</p> <p>3 MS. PERALES: Objection. I'm sorry, I</p> <p>4 guess -- I will frame the objection as one for vagueness.</p> <p>5 I believe that the option would be to cast a mail ballot</p> <p>6 as opposed to voting in person for a person over 65.</p> <p>7 MR. ASTON: That's correct.</p> <p>8 MS. PERALES: Okay.</p> <p>9 Q. (BY MR. ASTON) Are you aware that -- let me</p> <p>10 rephrase the question.</p> <p>11 Are you aware that voters over the age of 65</p> <p>12 have the option to cast a mail-in ballot for which they do</p> <p>13 not need a photo ID?</p> <p>14 A. If I remember correctly, the law states that you</p> <p>15 must be disabled, you must be traveling, before you can</p> <p>16 use the vote by mail. Am I incorrect?</p> <p>17 Second, 65-year old voters who have voted</p> <p>18 traditionally love voting on election day in person.</p> <p>19 Q. Do you believe that rural voters are more likely</p> <p>20 than the average voter to lack a form of identification</p> <p>21 required by Senate Bill 14?</p> <p>22 A. I believe that Latino voters who live in rural</p> <p>23 Texas are more than likely poor. If they're young, they</p> <p>24 won't have the IDs required by this particular bill or</p> <p>25 law, and if they're older, they may definitely not have</p>



<p style="text-align: center;">41</p> <p>1 the appropriate documentation to acquire the</p> <p>2 documentations provided by the State in order to vote. I</p> <p>3 do believe that this law will jeopardize the right of</p> <p>4 Latino citizens who could vote in rural America Texas.</p> <p>5 Q. Do you believe that indigent voters are less</p> <p>6 likely than the average voter to be appropriately educated</p> <p>7 about the change in the identification requirements for</p> <p>8 voting under Senate Bill 14?</p> <p>9 A. I believe that the budget proposed by the State</p> <p>10 in order to educate voters is not sufficient and therefore</p> <p>11 it will also cost the taxpayer voters. And ultimately the</p> <p>12 poor voters in Texas will not be informed about the right</p> <p>13 to vote, or, more importantly, they will not have the</p> <p>14 right documentation in order to get the required</p> <p>15 documentation to vote in Texas should this law be</p> <p>16 implemented.</p> <p>17 Q. Do you believe that indigent voters are more</p> <p>18 likely than the average voter to lack a form of</p> <p>19 identification required by Senate Bill 14?</p> <p>20 A. I believe that the voters that are poor in Texas,</p> <p>21 including Latino voters who might not have the</p> <p>22 documentation, even if they could get it, might not have</p> <p>23 the money to be able to obtain it; therefore, it's a</p> <p>24 double tax.</p> <p>25 MR. ASTON: Go off the record for a minute.</p>	<p style="text-align: center;">43</p> <p>1 young voters are less likely than other voters?</p> <p>2 A. That's correct.</p> <p>3 Q. Finally, do you believe that voters without a</p> <p>4 high school diploma are less likely than voters with a</p> <p>5 high school diploma to be able to obtain a form of ID?</p> <p>6 A. I'm not sure, but yes.</p> <p>7 Q. Let's talk about possession -- current possession</p> <p>8 of photo IDs. Do you know how many Texas registered</p> <p>9 voters lack one of the forms of photo ID that would be</p> <p>10 required under SB 14?</p> <p>11 A. I believe the Secretary of State, by her own</p> <p>12 accounts, provided data that showed that there were about</p> <p>13 660,000 Latino voters that would not have the proper ID in</p> <p>14 order to vote. And I believe that there is others who</p> <p>15 believe that it is much higher. So at this point I have</p> <p>16 to rely on both, our perception, our understanding, our</p> <p>17 history, and what the Secretary of State and others have</p> <p>18 said.</p> <p>19 Q. The Secretary of State's figures, did those</p> <p>20 include all of the IDs listed under SB 14 or were those</p> <p>21 just people who do not currently have a driver's license</p> <p>22 or a personal ID provided by the State of Texas or do you</p> <p>23 recall?</p> <p>24 A. I don't remember.</p> <p>25 Q. Can Southwest Voter identify any Texas registered</p>
<p style="text-align: center;">42</p> <p>1 (Break.)</p> <p>2 Q. (BY MR. ASTON) A few more questions on this and</p> <p>3 then we'll move to a different topic.</p> <p>4 A. Okay.</p> <p>5 Q. Do you believe that indigent voters are less</p> <p>6 likely than nonindigent voters to be able to obtain a form</p> <p>7 of identification prescribed under Senate Bill 14?</p> <p>8 A. Yes.</p> <p>9 Q. And do you believe that elderly voters are less</p> <p>10 likely than nonelderly voters to be able to obtain a form</p> <p>11 of identification required under Senate Bill 14?</p> <p>12 A. I'm sorry. I think I lost it. Say it again.</p> <p>13 Q. Do you believe that elderly voters are less</p> <p>14 likely than nonelderly voters to be able to obtain one of</p> <p>15 the forms of identification?</p> <p>16 A. Yes.</p> <p>17 Q. Do you believe that disabled voters are less</p> <p>18 likely than other voters to be able to obtain a form of</p> <p>19 identification required under SB 14?</p> <p>20 A. Yes.</p> <p>21 Q. Do you believe that rural voters are less likely</p> <p>22 than urban or suburban voters to be able to obtain a form</p> <p>23 of identification required under SB 14?</p> <p>24 A. Yes. And I think I answered that already.</p> <p>25 Q. And I think we discussed before, you believe that</p>	<p style="text-align: center;">44</p> <p>1 voter who does not have one of the types of photo ID</p> <p>2 required by SB 14? Earlier you mentioned your two</p> <p>3 co-defendants.</p> <p>4 A. Our two co-defendants.</p> <p>5 Q. Are you aware of any other voters that you can</p> <p>6 name?</p> <p>7 A. Not that the point.</p> <p>8 Q. Your answer was, not at this point?</p> <p>9 A. No.</p> <p>10 Thank you for clarifying.</p> <p>11 Q. Do you know how many Texas registered voters lack</p> <p>12 the documents necessary to get a state-issued photo ID?</p> <p>13 A. I think I answered this already.</p> <p>14 Q. This is a different question.</p> <p>15 MS. PERALES: You may answer.</p> <p>16 A. Ask me again. Maybe I didn't understand.</p> <p>17 Q. (BY MR. ASTON) A moment ago we talked about who</p> <p>18 doesn't currently have the photo ID. What I'm asking now</p> <p>19 is do you know how many Texas registered voters lack the</p> <p>20 underlying documents that would be necessary to get a</p> <p>21 state-issued photo ID?</p> <p>22 A. I'm not sure.</p> <p>23 Q. Can Southwest Voter identify any Texas -- any</p> <p>24 Texas registered voter who does not have those documents</p> <p>25 necessary to get a state issued photo ID?</p>



<p style="text-align: center;">45</p> <p>1 A. Besides the two young women?</p> <p>2 Q. Besides the two young women.</p> <p>3 A. No.</p> <p>4 Q. But it is your contention that they do not have</p> <p>5 the necessary documents?</p> <p>6 A. Correct.</p> <p>7 Q. Do you know what it is they lack?</p> <p>8 A. The required ID that they need to vote.</p> <p>9 Q. Do you know what documents they lack, if any --</p> <p>10 A. No, I don't.</p> <p>11 Q. -- that would make them eligible to get the</p> <p>12 election identification --</p> <p>13 A. You're right --</p> <p>14 Q. -- certificate?</p> <p>15 A. -- I don't.</p> <p>16 Q. And they're the only two that you're aware of</p> <p>17 that potentially lack those documents at this time?</p> <p>18 A. At this time.</p> <p>19 Q. Has Southwest Voter done any studies regarding</p> <p>20 photo ID possession by Texas registered voters?</p> <p>21 A. No.</p> <p>22 Q. Has Southwest Voter conducted any surveys of</p> <p>23 photo ID possession by Texas registered voters?</p> <p>24 A. No.</p> <p>25 Q. Are you aware that photo ID laws have been</p>	<p style="text-align: center;">47</p> <p>1 possession by registered voters in Texas?</p> <p>2 A. With the current law or the SB 14 --</p> <p>3 Q. The current possession of photo IDs in Texas</p> <p>4 based on race, are you familiar with that?</p> <p>5 A. I'm not sure I'm understanding your question.</p> <p>6 Ask again.</p> <p>7 Q. Let's maybe try and break it up. Are you</p> <p>8 familiar with the level -- what percentage of Hispanic or</p> <p>9 Latino voters have a photo ID?</p> <p>10 MS. PERALES: Objection to the extent that</p> <p>11 it was asked and answered. When you mentioned earlier</p> <p>12 whether she had information about whether there were</p> <p>13 people who lacked voter ID in Texas and Ms. Camarillo</p> <p>14 answered with the Secretary of State study.</p> <p>15 But you may answer. Subject to that</p> <p>16 objection, you can go ahead and answer.</p> <p>17 A. Well, I'm not sure I can answer anything more</p> <p>18 than what I've already stated, so...</p> <p>19 Q. (BY MR. ASTON) Are you familiar with the levels</p> <p>20 of photo ID possession by African-American registered</p> <p>21 voters in Texas?</p> <p>22 A. I have less information about the black</p> <p>23 community. I would not be able to answer that.</p> <p>24 Q. And what about Anglo voters?</p> <p>25 A. Same. My experience is with Latinos.</p>
<p style="text-align: center;">46</p> <p>1 enacted and are in place in other states?</p> <p>2 A. Yes.</p> <p>3 Q. Are you aware that they're in place in Georgia?</p> <p>4 A. Yes.</p> <p>5 Q. And Indiana?</p> <p>6 A. Correct.</p> <p>7 Q. Are you at all familiar with the levels of photo</p> <p>8 ID possession by voters in Georgia by African-Americans?</p> <p>9 A. I do not -- I am not familiar with it completely.</p> <p>10 Q. Anglos?</p> <p>11 A. I'm not familiar with it completely.</p> <p>12 Q. Hispanics?</p> <p>13 A. I'm not familiar with it completely.</p> <p>14 Q. What do you know? What are you aware of?</p> <p>15 A. I don't remember right now.</p> <p>16 Q. What about for Indiana? Are you aware of any</p> <p>17 information regarding photo ID possession by registered</p> <p>18 voters in Indiana?</p> <p>19 A. I don't remember right now for Indiana or</p> <p>20 Georgia.</p> <p>21 Q. Has Southwest Voter ever looked into those two</p> <p>22 matters, Georgia or Indiana?</p> <p>23 A. I have. I never got -- I'm sorry. I forgot</p> <p>24 right now. I don't remember.</p> <p>25 Q. Are you familiar with the levels of photo ID</p>	<p style="text-align: center;">48</p> <p>1 Q. The Secretary of State's numbers, do you</p> <p>2 acknowledge that if those numbers were compiled listing --</p> <p>3 using only state-issued photo ID, that the numbers might</p> <p>4 be overinclusive as to who does not currently have a photo</p> <p>5 ID that is on the list in Senate Bill 14?</p> <p>6 A. Restate.</p> <p>7 Q. Sure.</p> <p>8 The Secretary of State, if she compiles a list of</p> <p>9 registered voters who lack a state-issued photo ID --</p> <p>10 A. Right. She found 660,000.</p> <p>11 Q. -- that number might be -- that number might be</p> <p>12 overinclusive or be a larger than actually accurate list</p> <p>13 of people who do not have the photo ID required to vote</p> <p>14 because Senate Bill 14 allows for other forms of ID issued</p> <p>15 by the federal government?</p> <p>16 A. Yes, but we've discussed this before where I've</p> <p>17 mentioned that even if it's possible to get the</p> <p>18 documentation, if it's impossible to get there because gas</p> <p>19 cost --</p> <p>20 Q. I'm asking about people who may already have a</p> <p>21 federally-issued photo ID, like a passport or military ID.</p> <p>22 A. Uh-huh.</p> <p>23 Q. Do you acknowledge that some of the people on the</p> <p>24 list of the Secretary of State, people without a</p> <p>25 state-issued photo ID might currently already possess a</p>



<p style="text-align: center;">49</p> <p>1 federally issued photo ID, such as a passport or a</p> <p>2 military ID, that would allow them to vote even if Senate</p> <p>3 Bill 14 goes into effect?</p> <p>4 A. I acknowledge that but I also acknowledge that</p> <p>5 they might not have it, so I think the point goes either</p> <p>6 way.</p> <p>7 Q. Do you believe that Hispanic and Latino voters</p> <p>8 are more likely or less likely than other voters to have a</p> <p>9 passport?</p> <p>10 A. Less likely. It costs money to travel so I don't</p> <p>11 know that they would have a passport. There is only a few</p> <p>12 of us that travel. And I don't believe that they would</p> <p>13 have the gun permits, certificate, but I don't know.</p> <p>14 Q. The gun permit --</p> <p>15 A. I guess my answer to your question would be, I'm</p> <p>16 not sure because it could go either way.</p> <p>17 Q. But you acknowledge the possibility?</p> <p>18 A. There is a possibility that they could have it,</p> <p>19 and there is a possibility they could not have it. So it</p> <p>20 might actually be worse. And it might be better. I don't</p> <p>21 know.</p> <p>22 Q. But you acknowledge that a Hispanic or a Latino</p> <p>23 voter who has either a passport or a military ID would be</p> <p>24 able to vote even if Senate Bill 14 goes into effect?</p> <p>25 A. Yes, since that's one of the allowed</p>	<p style="text-align: center;">51</p> <p>1 like an infrastructure or cleaning the water or whatever</p> <p>2 is it is that we need. Found no voter fraud.</p> <p>3 The fact that it's an attempt to attack the</p> <p>4 Latino community. We're talking about the Latinos who are</p> <p>5 the ones that are -- supposedly the ones that are voting</p> <p>6 fraudulently in person.</p> <p>7 So, yes, I do believe that the State of Texas</p> <p>8 intentionally put this legislation to stop Latino voters</p> <p>9 and other voters from fulfilling their right to vote as</p> <p>10 American citizens.</p> <p>11 Q. Do you have any other evidence that supports your</p> <p>12 contention that this bill was enacted with a</p> <p>13 discriminatory purpose?</p> <p>14 A. I think that's evidence enough.</p> <p>15 Q. But do you have any more?</p> <p>16 A. I am sure I can find others.</p> <p>17 Q. But at this time you have no more evidence?</p> <p>18 A. At this time that's the only thing I want to say.</p> <p>19 MS. PERALES: You have to answer completely</p> <p>20 for what you know right now.</p> <p>21 A. Well, we know that 2.4 million more people grew</p> <p>22 in the state of Texas. We know that that growth is a</p> <p>23 result of -- 90 percent of it is because of the minority</p> <p>24 community. 65 percent of that is because of the Latino</p> <p>25 community. And there is a genuine fear, we believe -- I</p>
<p style="text-align: center;">50</p> <p>1 documentations where you could vote.</p> <p>2 Q. Let's talk about the purpose of the bill.</p> <p>3 A. Okay.</p> <p>4 Q. You've -- in sort of talking about effect you've</p> <p>5 discussed purpose a bit. But does Southwest Voter contend</p> <p>6 that Senate Bill 14 was enacted with a discriminatory</p> <p>7 purpose?</p> <p>8 A. I do.</p> <p>9 Q. And what is the basis for that contention, what</p> <p>10 is the evidence that you have?</p> <p>11 A. The history of Texas, a long history of Texas of</p> <p>12 being a state that we need to have Section 2 and Section 5</p> <p>13 of the voting rights to protect our rights because it's a</p> <p>14 state that is part of the southern states that have a</p> <p>15 history of discrimination.</p> <p>16 The fact that this year was a year of</p> <p>17 redistricting and in the redistricting, people take --</p> <p>18 those in control want to keep their power and they want to</p> <p>19 have in -- their intent is to maintain it and so if it</p> <p>20 means stopping by creating other barriers, they will do</p> <p>21 so.</p> <p>22 By the fact that the State claims that there was</p> <p>23 a crisis when in fact there was no crisis, even after the</p> <p>24 Attorney General spent significant amount of resource that</p> <p>25 could have been used for higher education for something</p>	<p style="text-align: center;">52</p> <p>1 believe, by the laws that are being implemented. We know</p> <p>2 that the State of Texas has a history of violating and</p> <p>3 stopping Latino and other voters from voting.</p> <p>4 Intent, as you know, is -- can be accumulative of</p> <p>5 all those things put together, and I believe that all</p> <p>6 those things put together demonstrate that the State of</p> <p>7 Texas has the intention to stop Latino and other voters</p> <p>8 from voting and, therefore, has the intent to purposely</p> <p>9 stop Latino voters who are American citizens and other</p> <p>10 voters from voting that are American citizens.</p> <p>11 In particular because HAVA already exists, and</p> <p>12 the current law already allows us to vote with certain</p> <p>13 documentations and there is -- we found no evidence -- the</p> <p>14 State found no evidence of people who are -- who voted</p> <p>15 fraudulently in person.</p> <p>16 Q. (BY MR. ASTON) Do you contend that preventing</p> <p>17 voter fraud was not the purpose of Senate Bill 14?</p> <p>18 A. I contend that the State used that as a veiled</p> <p>19 attempt to say that in fact there was a crisis. But after</p> <p>20 the Attorney General spent \$1.5 million over two years and</p> <p>21 found no case, then what crisis exists? None whatsoever.</p> <p>22 If there is no crisis and there is a bill to stop</p> <p>23 a crisis that doesn't exist and it's an added burden</p> <p>24 because we already have HAVA, and HAVA, as you remember,</p> <p>25 was established in 2000 with the idea that it would help</p>





<p style="text-align: center;">53</p> <p>1 America vote. That's why it's even called the Help 2 America Vote Act. And it provided for several documents. 3 People also know that when they sign the 4 certificate, it's an affidavit, a legal document. We also 5 know that undocumented, which is really the intent of this 6 stopping supposedly American citizens, claiming that it's 7 really fraudulent because noncitizens will not vote, 8 noncitizens, if their residence is here legally, do not 9 want to jeopardize their opportunity of becoming citizens 10 someday. And the undocumented certainly don't want to be 11 split from their families. 12 So we know that there is no crisis, we know that 13 American citizens, because they are the only ones that can 14 vote, are the ones that are being attacked by this bill 15 and this law and, therefore, its purposeful and 16 intentional. 17 And another example of the many patterns of 18 activities that happen in the State of Texas, including 19 polarized voting, we saw when Carrillo ran for office or 20 Judge Rodriguez ran for office, they were incumbents, they 21 were supported by the establishment, they raised the most 22 money, but white voters refused to vote for them in their 23 own party. 24 I believe that that, as a cumulative, provides 25 purpose and intent.</p>	<p style="text-align: center;">55</p> <p>1 them, are working poor; therefore, they will be impacted 2 and, therefore, the answer as asked implies and says 3 directly that Latinos will impact it because they're poor. 4 Q. Do you contend that the Texas legislature 5 intended to harm young people by passing Senate Bill 14? 6 A. Yes. By the very fact that they did not allow 7 for student IDs to be used as an official, appropriate ID, 8 yes. 9 Q. So the intention was to harm -- 10 A. Yes. 11 Q. -- young voters? 12 A. Yes. And we know that young voters in Texas are 13 mostly Latino and black. 14 Q. Do you contend that the Texas legislature 15 intended to harm elderly people by passing SB 14? 16 A. Yes. 17 Q. And what is the basis for your contention that 18 they intended to harm the elderly? 19 A. Because we know that the elderly are less likely 20 to have their documents because they either lost them, 21 they got destroyed or they were born at a time when they 22 didn't have the money to and they were not born in a 23 hospital where they were given the appropriate 24 documentation. 25 Q. Would you acknowledge that a vote by mail counts</p>
<p style="text-align: center;">54</p> <p>1 Q. Do you contend that the Texas legislature 2 intended to harm poor people by passing Senate Bill 14? 3 A. Yes. Some of the Latinos are poor, the working 4 poor. 25 percent or over. 5 Q. So their intent was to harm people because they 6 were poor? 7 A. Their intent was to stop Latino and other voters 8 from voting and, as a result, as a consequence, poor 9 people will be impacted, of which many of the Latino 10 voters are poor. 11 Q. You said as consequence. That might be an 12 effect. Is it Southwest Voter's contention that the 13 legislature intended to harm the poor? 14 A. Yes. 15 Q. What is basis for that contention? 16 A. In the statement I made earlier. 17 Q. Are you referring to the one from just a couple 18 of minutes ago? 19 A. Yes, sir. 20 Q. And that provides all the information you have on 21 intent with respect to poor people? 22 A. That's part of it, yes. 23 Q. What else is there? 24 A. Well, that's all I have in terms of the poor 25 people, yes. I'm saying that Latinos, a good portion of</p>	<p style="text-align: center;">56</p> <p>1 just as a -- an in-person ballot counts? 2 A. I would and I also have stated in my earlier 3 testimony that elderly people prefer to vote in person, A, 4 and as I understand the law, and I asked if I was wrong 5 for you to correct me, that in order for an elderly person 6 to vote by mail they must be disabled or they must be 7 traveling. Am I incorrect with your -- 8 MS. PERALES: You just state your best 9 understanding. 10 THE WITNESS: Okay. Thank you. 11 Q. (BY MR. ASTON) Do you contend that the Texas 12 legislature intended to harm rural voters by passing 13 Senate Bill 14? 14 A. Yes. 15 Q. And what is the basis for that contention? 16 A. Because most of the offices where people can go 17 get their ID, should they not have them, in rural 18 communities have either been closed or will be shut down 19 as a result of the shortage, and rural people are usually 20 very poor people; therefore, they will not be able to have 21 the documentation because either they can't afford to buy 22 it, to get it, or they cannot afford the gas in order to 23 drive the long distances that are required and, therefore, 24 they're being intentionally discriminated against. 25 Q. Do you have any other evidence for the basis of</p>



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1 your contention with regard to rural voters?

2 A. That's what I have.

3 Q. Do you contend that the Texas legislature  
4 intended to harm urban voters by passing Senate Bill 14?

5 A. Yes.

6 Q. And please explain the evidence and the basis for  
7 that contention?

8 A. Urban voters are more likely to be Latino and  
9 African-American, and this bill was intended to stop  
10 Latino and African-American voters from casting their  
11 vote, and that vote being counted.

12 Q. Please name for me all the members of the Texas  
13 legislature that Southwest Voter contends acted with a  
14 discriminatory purpose in supporting and voting for Senate  
15 Bill 14.

16 A. You would ask me this and I'm going to become a  
17 citizen. I'm sorry. That was disrespectful. I  
18 apologize.

19 I cannot remember the names of the members right  
20 now, but we can start with the authors of the bills. And  
21 I don't know the names so they're -- they're on record.

22 Q. So Southwest Voter --

23 A. At this point I do not remember the name of the  
24 members.

25 Q. -- contends that some or all of the authors of

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1 the bill intended to discriminate?

2 A. Yes. I also contend that those that voted in  
3 favor intended to discriminate.

4 Q. How many of them?

5 A. All of them that voted in favor of this bill, as  
6 well as the governor, who signed it.

7 Q. So Southwest Voter believes that every member of  
8 the Texas legislature who voted for this bill did so for  
9 the purpose of discrimination?

10 A. Yes.

11 Q. Do you have any evidence for that contention in  
12 addition to all of the things that we've been discussing  
13 before?

14 A. I do not have anything other than what I've said,  
15 and accumulatively that I believe was purposely intent to  
16 stop voters from voting that are Latino or otherwise.

17 MR. ASTON: Go off the record for two  
18 minutes.

19 (Break.)

20 Q. (BY MR. ASTON) Do you support the idea that only  
21 registered voters should be allowed to vote?

22 A. That's the law. Yes.

23 Q. Does Southwest Voter support the idea that one  
24 should have to register prior to voting?

25 A. Yes.

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1 Q. What is voter fraud? How would Southwest Voter  
2 define voter fraud?

3 A. Well, when someone does not have the right --  
4 according to the law of that moment, because laws  
5 change -- votes. That's how I would define it.

6 Q. Would you agree that voter fraud includes someone  
7 showing up to vote and claiming that he or she is a person  
8 that he or she is not?

9 A. Of course.

10 Q. And does Southwest Voter agree that voter fraud  
11 should be illegal?

12 A. Yes. But there is a difference between voter  
13 fraud and the intent of this law. I still -- in spite of  
14 me agreeing with everybody's agreement that there should  
15 be no voter fraud. And only those who have the right by  
16 the current laws to vote should vote and that their vote  
17 be counted. America still does not count the -- every  
18 presidential cycle, 1 million people will vote and they  
19 will not be counted. So we still have a problem in  
20 America.

21 But in this particular case, I think there is a  
22 problem. There is intent. And in spite of us believing  
23 that there should be no fraud, this bill does not in any  
24 way, shape, or form stop fraud. And there was no fraud or  
25 crisis established by the State.

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1 Q. Do you believe that in-person voter fraud would  
2 be harder to detect than mail-in voter fraud?

3 A. I'm not sure I -- that question is vague.

4 MS. PERALES: If you don't understand the  
5 question, you can say that you don't understand the  
6 question.

7 A. I don't understand. Give me an example, please.

8 Q. (BY MR. ASTON) Let me ask it this way. Do you  
9 think that the State of Texas should try and stop voter  
10 fraud?

11 A. I think if the State of Texas finds that there is  
12 voter fraud, then it should work to stopping it. But in  
13 this instance we know that this does not apply.

14 Q. Do you believe it would harder to detect  
15 in-person voter fraud?

16 A. That's why I don't understand your question. The  
17 whole intent of the SB 14 was to stop Latinos and  
18 African-Americans from voting, and it was really an intent  
19 to stop the so-called noncitizens who do not vote, who do  
20 not take part, who do not sign an affidavit saying that  
21 they're registered voters; therefore, this law does not  
22 apply.

23 But your questions have to do with a general  
24 sense of fraud --

25 Q. That's correct.



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1 A. -- and of course we do agree that there should be  
2 no fraud. But in this case, this bill is not the right  
3 tool, it's not the right law, and it violates our  
4 constitutional right as voters.

5 Q. Do you believe it would harder for the State of  
6 Texas to detect in-person voter fraud -- for example, one  
7 person going into one voting booth and voting one ballot  
8 for someone that he or she is not. Would that be harder  
9 to detect than someone taking a large stack of ballots,  
10 filling them out in the same handwriting and mailing them  
11 in?

12 A. I'm still not understanding your question. But  
13 let me state this. HAVA already provides for different  
14 opportunities for the poll workers to determine who is a  
15 voter and that that voter is a correct voter. So I do  
16 believe that there is already systems in place to stop  
17 fraud, if that is your question.

18 Q. Would you agree that in order to detect in-person  
19 voter fraud, one would have to be present and witness it?

20 A. I'm not sure I understand your question. Reframe  
21 or restate or give me an example.

22 Q. If someone goes into a voting place claiming to  
23 be a person that he or she is not, and is given that  
24 ballot and votes, would you agree that in order to stop  
25 that sort of voter fraud, you would need to stop it at the

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1 polling place?

2 A. Again, SB 14 does not do that. SB 14 is an  
3 attempt, purposeful and otherwise, to stop Latinos and  
4 other communities of color from voting. There are in  
5 place, according to many laws that were already  
6 established by the legislature and passed and signed by  
7 the Governor, so the State, to make sure that the  
8 elections law allows for systems to be in place to  
9 prohibit people from voting that do not have the right to  
10 vote. And HAVA clearly provides for documents so that the  
11 polling voters -- the watch -- the poll workers at the  
12 polls can identify whether that voter was there.

13 Second, because it's being -- the poll workers  
14 sign when somebody votes. Someone cannot sign and vote  
15 again. So I think we have the systems in place to stop  
16 any voter fraud, and SB 14 only is attempting to stop  
17 Latino American citizens and other voters who are American  
18 citizens from voting in America and in Texas specifically.

19 Q. Do you believe that requiring a voter to show a  
20 photo ID would make it harder for voters to vote claiming  
21 to be someone that he or she is not?

22 A. I do not believe that this law is going to do  
23 what you're trying to do.

24 Q. But do you believe it would be harder to vote as  
25 someone you are not if you are required to show a photo ID

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1 at the poll?

2 A. I already stated that HAVA already provides for  
3 those systems, and there are systems in place to stop us  
4 from having fraud in Texas. And there are no cases that  
5 we can really identify, and there is no crisis; therefore,  
6 this law is not necessary and all it is is an attempt to  
7 violate the voter rights of Latinos and other voters.

8 Q. So is the answer it would not make it harder?

9 A. My answer is that this bill will not answer your  
10 question. It will not remedy what does not exist because  
11 it doesn't exist in the way that this bill is --

12 Q. My question is just a general question. It's not  
13 about Senate Bill 14 particularly.

14 A. I know. But if you're going to use it, then I'm  
15 putting it on the record. My answer on the record is that  
16 there is no crisis, there is no fraud, and voters already  
17 know that if they are not the voter that's supposed to  
18 vote, that they cannot vote. And there are systems in

19 place to stop a voter from creating fraud, starting with  
20 HAVA.

21 Q. The question is, though, would requiring showing  
22 a photo ID make it harder for someone to vote claiming to  
23 be someone that he or she is not?

24 A. I've already answered that question.

25 Q. I don't believe you have.

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1 MS. PERALES: Do you want to object as  
2 nonresponsive? Keep trying?

3 MR. ASTON: I guess so.

4 MS. PERALES: It's up to you.

5 MR. ASTON: If she's not going to answer the  
6 question, then, yes, I'll object as nonresponsive.

7 THE WITNESS: Thank you. Because I've  
8 answered.

9 MS. PERALES: He's looking for a yes or a  
10 no --

11 THE WITNESS: I understand.

12 MS. PERALES: -- which you can give along  
13 with an explanation of why you believe it's a yes or a no.  
14 But perhaps your answer would be more responsive if you  
15 started with a yes or a no, and then you are free to  
16 explain your answer.

17 THE WITNESS: But what's wrong with what I  
18 said?

19 MS. PERALES: I believe perhaps that it was  
20 not -- I can't say for Mr. Aston, but perhaps he is  
21 seeking a yes or a no, and then you are free in the rules  
22 of the deposition to give your explanation.

23 THE WITNESS: I understand that, but I want  
24 to sustain my answer, if it's okay with you.

25 Q. (BY MR. ASTON) Well, you're not going to retract



<p style="text-align: center;">65</p> <p>1 anything that you've said.</p> <p>2 A. I understand. But I don't want to use any of the</p> <p>3 information that I've given as an excuse for this law to</p> <p>4 be implemented when we all know that this law is an</p> <p>5 attempt to stop Latino voters who are citizens from</p> <p>6 participating in America's democracy.</p> <p>7 MS. PERALES: Would you like to ask the</p> <p>8 question again or have the court reporter ask the</p> <p>9 question, and then I'll ask Ms. Camarillo to begin her</p> <p>10 answer with a yes or a no and then explain her position.</p> <p>11 MR. ASTON: Would you read back the last</p> <p>12 question, please.</p> <p>13 MS. PERALES: Let's go off the record.</p> <p>14 MR. ASTON: Okay.</p> <p>15 (The requested material was read.)</p> <p>16 A. I don't know. But I restate my previous</p> <p>17 statements, which are that I believe that the State of</p> <p>18 Texas was not able to prove, in spite of spending</p> <p>19 \$1.5 million that we do not have, on trying to find</p> <p>20 fraudulent votes. I believe that this bill and law is</p> <p>21 specific and intended to stop citizens from voting, and</p> <p>22 citizens that are Latino and are not -- and are people of</p> <p>23 color.</p> <p>24 I believe that HAVA and other systems that exist</p> <p>25 already prohibit any voter fraud, and if -- and it's</p>	<p style="text-align: center;">67</p> <p>1 CHANGES AND SIGNATURE</p> <p>2 PAGE LINE CHANGE REASON</p> <p>3 _____</p> <p>4 _____</p> <p>5 _____</p> <p>6 _____</p> <p>7 _____</p> <p>8 _____</p> <p>9 _____</p> <p>10 _____</p> <p>11 _____</p> <p>12 _____</p> <p>13 _____</p> <p>14 _____</p> <p>15 _____</p> <p>16 _____</p> <p>17 _____</p> <p>18 _____</p> <p>19 _____</p> <p>20 _____</p> <p>21 _____</p> <p>22 _____</p> <p>23 _____</p> <p>24 _____</p> <p>25 _____</p> <p style="text-align: center;">LYDIA CAMARILLO</p>
<p style="text-align: center;">66</p> <p>1 clear by the fact that the State is unable to put forth</p> <p>2 any real cases of fraud. Therefore, I believe that this</p> <p>3 law, all it does is violate the voting rights of Latinos</p> <p>4 and other communities of color. And I'm speaking of</p> <p>5 Latino citizens.</p> <p>6 And for the record my previous answer was better.</p> <p>7 So use both.</p> <p>8 MR. ASTON: I believe that's all I have.</p> <p>9 THE WITNESS: Thank you. I know you're</p> <p>10 doing your job, and I'm doing mine.</p> <p>11 MS. PERALES: Okay. Mr. Aston is now</p> <p>12 passing the witness to me, and I will reserve my questions</p> <p>13 for the time of trial.</p> <p>14 I think we're done. Unless --</p> <p>15 MS. McLEOD: No.</p> <p>16 (THE DEPOSITION CONCLUDED AT 10:41 A.M.)</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: center;">68</p> <p>1 SIGNATURE PAGE</p> <p>2</p> <p>3 I, LYDIA CAMARILLO, have read the foregoing</p> <p>4 deposition and hereby affix my signature that same is true</p> <p>5 and correct, except as noted above.</p> <p>6</p> <p>7 _____</p> <p>8 LYDIA CAMARILLO</p> <p>9</p> <p>10 THE STATE OF _____)</p> <p>11 COUNTY OF _____)</p> <p>12 Before me, _____, on this</p> <p>13 day personally appeared LYDIA CAMARILLO, known to me (or</p> <p>14 proved to me under oath or through _____) (description of identity card</p> <p>15 or other document)) to be the person whose name is</p> <p>16 subscribed to the foregoing instrument and acknowledged to</p> <p>17 me that they executed the same for the purposes and</p> <p>18 consideration therein expressed.</p> <p>19 Given under my hand and seal of office this</p> <p>20 _____ day of _____, 2012.</p> <p>21</p> <p>22 _____</p> <p>23 NOTARY PUBLIC IN AND FOR</p> <p>24 THE STATE OF _____</p> <p>25 COMMISSION EXPIRES: _____</p>



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1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE DISTRICT OF COLUMBIA

3 )  
4 STATE OF TEXAS, )  
5 Plaintiff, )  
6 VS. )  
7 )  
8 ERIC H. HOLDER, JR., IN )  
9 HIS OFFICIAL CAPACITY AS )  
10 ATTORNEY GENERAL OF THE )  
11 UNITED STATES, )  
12 Defendant, )  
13 ERIC KENNIE, ET AL., )  
14 Defendant-Intervenors, )  
15 )  
16 THE TEXAS SATE CONFERENCE )  
17 OF NAACP BRANCHES, ET ) CASE NO. 1:12-CV-00128  
18 AL., ) (RMC-DST-RLW)  
19 ) Three-Judge Court  
20 Defendant-Intervenors, )  
21 )  
22 TEXAS LEAGUE OF YOUNG )  
23 VOTERS EDUCATION FUND, ET )  
24 AL., )  
25 Defendant-Intervenors, )

18 TEXAS LEGISLATIVE BLACK )  
19 CAUCUS, ET AL., )  
20 Defendant-Intervenors, )  
21 )  
22 VICTORIA RODRIGUEZ, ET )  
23 AL., )  
24 Defendant-Intervenors. )  
25

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1  
2 That \$\_\_\_\_\_ is the deposition officer's charges  
3 to the Plaintiff for preparing the original deposition  
4 transcript and any copies of exhibits;  
5 I further certify that I am neither counsel for,  
6 related to, nor employed by any of the parties or  
7 attorneys in the action in which this proceeding was  
8 taken, and further that I am not financially or otherwise  
9 interested in the outcome of the action.  
10 Certified to by me this 14th day of June, 2012.




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1 REPORTER'S CERTIFICATION  
2 DEPOSITION OF LYDIA CAMARILLO  
3 JUNE 12, 2012

4 I, Tamara K. Chapman, Certified Shorthand Reporter in  
5 and for the State of Texas, hereby certify to the  
6 following:

7 That the witness, LYDIA CAMARILLO, was duly sworn by  
8 the officer and that the transcript of the oral deposition  
9 is a true record of the testimony given by the witness;  
10 That the deposition transcript was submitted on  
11 \_\_\_\_\_ to the witness or to the attorney for  
12 the witness for examination, signature and return to me by  
13 \_\_\_\_\_;  
14 That the amount of time used by each party at the  
15 deposition is as follows:  
16 MR. ASTON - 1:22  
17 MS. McLEOD - 0:00  
18 MS. PERALES - 00:00  
19 That pursuant to information given to the deposition  
20 officer at the time said testimony was taken, the  
21 following includes counsel for all parties of record:  
22 Mr. Adam Aston - FOR THE PLAINTIFF STATE OF TEXAS  
23 Ms. Michelle McLeod - FOR THE DEFENDANTS ERIC H.  
24 HOLDER, ET AL.  
25 Ms. Nina Perales - RODRIGUEZ DEFENDANT-INTERVENORS



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